IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF TEXAS CORPUS CHRISTI DIVISION

DAVID HAVERKAMP,	S	
TDCJ NO. 702013	Š	
Plaintiff,	S	
	S	Civil No. 2:17-CV-00018
V.	\$	
	S	
JOSEPH PENN, et al.,	S	
Defendants,	S	

NOTICE OF DEFENDANTS' JOINT INITIAL DISCLOSURES

Defendants Dr. Robert Greenberg, Preston Johnson, Jr, Dr. John Burruss, Erin Wyrick, Dr. Jeffrey Beeson, Joe Perez, Dr. Cynthia Jumper, Dr. F. Parker Hudson and Lanette Linthicum submits this notice of their initial disclosures to Plaintiff on March 8, 2022, in accordance with Federal Rule of Civil Procedure 26(e)(1).

Respectfully submitted,

KEN PAXTON

Attorney General of Texas

BRENT WEBSTER

First Assistant Attorney General

GRANT DORFMAN

Deputy First Assistant Attorney General

SHAWN COWLES

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<u>|s| Erika D. Hime</u>

ERIKA D. HIME

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*ATTORNEY OF RECORD – COUNSEL FOR DEFENDANTS'

NOTICE OF ELECTRONIC FILING

I, **ERIKA D. HIME**, Assistant Attorney General of Texas, certify that I have electronically submitted for filing a true copy of **Notice of Defendants' Joint Initial Disclosures** in accordance with the Electronic Case Files System of the Southern District of Texas, on March 8, 2022.

Isl Erika D. Hime
ERIKA D. HIME
Assistant Attorney General

CERTIFICATE OF SERVICE

I, **ERIKA D. HIME**, Assistant Attorney General of Texas, do hereby certify that a true and correct copy of **Notice of Defendants' Joint Initial Disclosures** and forgoing has been served via electronic service and email on March 8, 2022, addressed to:

Ace M. Factor
Susman Godfrey L.L.P.
afactor@susmangodfrey.com
Attorney for Plaintiff

| Srika D. Hime | ERIKA D. HIME | Assistant Attorney General